

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 08-cr-374-2
	)	Honorable Samuel Der-Yeghiayan
AHMAD ALI AHMAD	)	

DEFENDANT AHMAD ALI AHMAD'S STATEMENT OF COMPLIANCE  
WITH LOCAL CRIMINAL RULE 16.1

Defendant AHMAD ALI AHMAD, by and through his attorneys DOUGLAS E. WHITNEY and JOSHUA G. HERMAN pursuant to L. Crim. R. 16.1, states as follows:

1. As of August 18, 2008, defense counsel had received four sets of discovery materials from the government, consisting documents bates labeled: 7-2-08 Production #1-243; Ahmad 07-08-08 #1-85; Ahmad 07/24/08 #1-308; and 08 GJ 534 #1-263. These materials contain F.B.I. reports of investigation, telephone records, seven discs that contain various digital still and video images, and other miscellaneous materials.

2. The deliveries were from Assistant United States Attorney Erik Hogstrom.

3. The government has provided what it maintains are all statements of the defendants in its possession.

4. Pursuant to L. Crim. R. 16.1, defense counsel and the government have conferred on discovery issues.

5. The undersigned and AUSA Erik Hogstrom have also agreed upon the following matters under L. Crim. R. 16.1:

- (a) The government has agreed to instruct all agents (including all Oak Lawn police officers) to preserve their written notes.

- (b) The government will provide defense counsel with all materials subject to 18 U.S.C. § 3500 three weeks in advance of trial.
- (c) The government will provide defense counsel with written notice of its intent to introduce any evidence pursuant to Fed. R. Evid. 404(b) three weeks in advance of trial.
- (d) The government will provide defense counsel with all materials relating to any expert witnesses under Fed. R. Crim. P. 16(a)(1)(E) no later than four weeks in advance of trial.

6. The government has informed defense counsel that it recognizes its obligations under *Brady v. Maryland*, 373 U.S. 83 (1973), *Giglio v. United States*, 405 U.S. 150 (1972), and *United States v. Bagley*, 473 U.S. 667 (1985), and should any exculpatory evidence for the defendant become known to the government, it would immediately make it available to the defendant.

7. Defense counsel acknowledges his responsibilities under Federal Rule of Criminal Procedure 16(b) and L. Crim. R. 16.1.

Respectfully submitted,

AHMAD ALI AHMAD

By: /s/ Joshua G. Herman

Douglas E. Whitney  
Joshua G. Herman  
McDERMOTT WILL & EMERY LLP  
227 West Monroe, Suite 4400  
Chicago, Illinois 60606  
(312) 984-6991